

Hearing Date: December 20, 2012 at 10:00 a.m. (ET)  
Objection Deadline: November 19, 2012 at 4:00 p.m. (ET)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)

(Jointly Administered)

Re: Docket No. 2049

**JOINDER OF DONNA MOORE, FRENCHOLA HOLDEN AND KEITH McMILLON  
TO LEAD PLAINTIFF'S LIMITED OBJECTION TO DEBTORS' MOTION FOR A  
SUPPLEMENTAL ORDER UNDER BANKRUPTCY CODE SECTIONS 105(a), 363,  
503(b)(1), 507(a)(2), 1107(a) AND 1108 AND BANKRUPTCY RULE 9019 TO THE FINAL  
WAGES ORDER (I) AUTHORIZING AND DIRECTING THE DEBTORS TO  
REIMBURSE ALLY FINANCIAL INC. FOR PAYMENTS MADE TO THE DEBTORS'  
EMPLOYEES ON ACCOUNT OF COMPENSATION ISSUED ON OR AFTER THE  
PETITION DATE; (II) GRANTING ALLY FINANCIAL INC. AN ADMINISTRATIVE  
EXPENSE CLAIM ON ACCOUNT OF SUCH PAYMENTS; (III) GRANTING ALLY  
FINANCIAL INC. A LIMITED RELEASE; AND (IV) AUTHORIZING THE DEBTORS  
TO ESTABLISH AND FUND AN ESCROW ACCOUNT FOR THE BENEFIT OF ALLY  
FINANCIAL INC. ON ACCOUNT OF SUCH ADMINISTRATIVE EXPENSE CLAIMS,  
INCLUDING ADDITIONAL AMOUNTS TO THE ESCROW ACCOUNT AS  
NECESSARY**

1. Donna Moore, Frenchola Holden and Keith McMillon, the proposed class representatives (the “RESPA Plaintiffs”), on behalf of themselves and the class of persons (the “RESPA Putative Class”), who obtained residential mortgage loans through GMAC Mortgage, LLC and GMAC Bank (collectively, “GMAC”) and paid for mortgage insurance issued by insurers with whom GMAC had captive insurance arrangements, in the proposed national class action styled as *Donna Moore, Frenchola Holden and Keith McMillon, individually and on behalf of all others similarly situated v. GMAC Mortgage, LLC, GMAC Bank and Cap Re of Vermont, Inc.*, Case No. 07-cv-04296-PD (E.D. Pa.) (the “RESPA Class Action”), asserting claims for damages against the Debtors and others for violations of the Real Estate Settlement Procedures Act of 1974, hereby join in the *Lead Plaintiff’s Limited Objection to Debtors’ Motion for a Supplemental Order Under Bankruptcy Code Sections 105(a), 363, 503(b)(1), 507(a)(2), 1107(a) And 1108 And Bankruptcy Rule 9019 to the Final Wages Order (I) Authorizing and Directing the Debtors To Reimburse Ally Financial Inc. for Payments Made to the Debtors’ Employees on Account of Compensation Issued on or After the Petition Date; (II) Granting Ally Financial Inc. an Administrative Expense Claim on Account of Such Payments; (III) Granting Ally Financial Inc. a Limited Release; and (IV) Authorizing the Debtors To Establish and Fund an Escrow Account for the Benefit of Ally Financial Inc. on Account of Such Administrative Expense Claims, Including Additional Amounts to the Escrow Account as Necessary* (the “Lead Plaintiff Limited Objection”)<sup>1</sup> [Docket No. 2226] filed by New Jersey Carpenters Health Fund on behalf of itself and the Class in opposition to the Motion [Docket No. 2049].

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Lead Plaintiff Limited Objection.

Dated: November 19, 2012  
New York, New York

Respectfully submitted,

/s/ Michael S. Etkin

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